



# **Air Quality Permitting Statement of Basis**

**May 16, 2005**

**Permit to Construct No. P-050403**

**Land O'Lakes Purina Feed LLC, Gooding**

**Facility ID No. 047-00011**

Prepared by:

Almer Casile, Permit Writer  
AIR QUALITY DIVISION

**FINAL**

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES .....	3
1. PURPOSE .....	4
2. FACILITY DESCRIPTION .....	4
3. FACILITY / AREA CLASSIFICATION.....	4
4. APPLICATION SCOPE .....	4
5. PERMIT ANALYSIS.....	4
6. PERMIT CONDITIONS .....	5
7. PUBLIC COMMENT .....	5
6. RECOMMENDATION.....	5
APPENDIX – AIRS INFORMATION .....	6

## **Acronyms, Units, and Chemical Nomenclatures**

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
m	meter(s)
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

## **2. FACILITY DESCRIPTION**

Land O'Lakes Purina Feed LLC is comprised of three process areas. The facility receives and stores grain using a grain receiving system, steam flakes corn and barley, and receives, stores, blends, and loads out vitamin/mineral supplements for the dairy industry.

## **3. FACILITY / AREA CLASSIFICATION**

Land O'Lakes Purina Feed LLC is defined as a minor facility because its potential to emit is less than all major source thresholds. The SIC code defining the facility is 0723 (Crop Preparation Services for Markets, Except Cotton Ginning). The AIRS facility classification is "B".

The facility is located within AQCR 63 and UTM zone 11. The facility is located in Gooding County which is designated as unclassifiable for all criteria pollutants (PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone).

The AIRS information provided in the appendix defines the classification for each regulated air pollutant at the facility. This required information is entered into the EPA AIRs database.

## **4. APPLICATION SCOPE**

The facility has requested to change the name of the facility to Land O'Lakes Purina Feed LLC. The former name of the facility was Land O'Lakes Farmland Feed LLC.

### **4.1 Application Chronology**

February 1, 2005	Application received.
February 16, 2005	Application declared complete.

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the regulatory requirements for this PTC revision.

### **5.1 Equipment Listing**

No equipment changes are associated with this PTC. For a complete listing of equipment, please refer to the technical memorandum issued with the November 8, 1999, permit to construct.

### **5.2 Emissions Inventory**

A new emissions inventory is not required because emissions are not increasing.

### **5.3 Modeling**

Ambient air quality modeling is not required because emissions are not increasing.

### **5.4 Regulatory Review**

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.209.04 ..... Revisions to Permits to Construct

This rule establishes the requirements for permit revisions. An opportunity for public comment is not required because emissions are not increasing.

### **5.5 Fee Review**

In accordance with IDAPA 58.01.01.224 and 226, no application and processing fees are required because this PTC revision is a facility name change only.

### **5.6 Regional Review of Draft Permit**

A copy of the draft permit was provided to the Twin Falls Regional Office on March 28, 2005.

### **5.7 Facility Review of Draft Permit**

The facility requested a draft copy of the permit on March 8, 2005. DEQ provided a draft permit April 8, 2005.

## **6. PERMIT CONDITIONS**

This section describes only those permit conditions that have been revised, modified or deleted as a result of this permit action. All other permit conditions remain unchanged.

- 6.1 Permit Condition 2.6 contains the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning, as requested by DEQs Twin Falls Regional Office. The permit condition is included in the permit to emphasize that open burning is regulated and that only certain forms of open burning are allowed.

## **7. PUBLIC COMMENT**

A PTC revision to a minor facility that does not include an emissions increase is not required to be provided for an opportunity for public comment.

## **6. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Land O'Lakes Purina Feed LLC be issued revised PTC No. P-050403. An opportunity for public comment is not required, no entity has requested a comment period, and the project does not involve PSD requirements.

**APPENDIX**

***AIRS INFORMATION***

**LAND O'LAKES PURINA FEED LLC**

**PTC No. P-050403**

# **AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM**

**Facility Name:** Land O'Lakes Purina Feed LLC

**Facility Location:** Gooding

**AIRS Number:** 047-00011

AIR PROGRAM								AREA CLASSIFICATION
POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	B							U
PM <sub>10</sub>	B							U
PT (Particulate)	B							U
VOC	B							U
THAP (Total HAPs)	B							U
			APPLICABLE SUBPART					

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).